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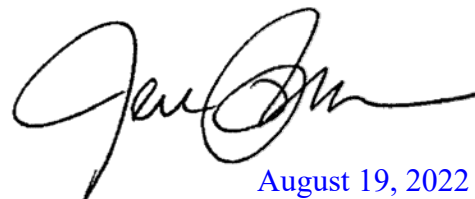
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August 18, 2022

VIA ECF

Honorable Jesse M. Furman  
United States District Court  
Southern District of New York  
40 Centre Street, Room 2202  
New York, NY 10007

Application GRANTED. The Clerk of Court is directed to modify ECF No. 1-4 and 4-3 to be viewable by the parties and Court only and to terminate ECF No. 13. SO ORDERED.



August 19, 2022

Re: ***Unopposed Motion to Seal Portions of Exhibit 2 to Koh Affidavit***  
**Koh v. Koo, Case No. 1:22-cv-06639.**

Dear Judge Furman:

Defendant Brian Koo submits this unopposed motion to seal portions of Exhibit 2 to Plaintiff Koh's affidavit in support of his requested TRO ("Exhibit 2"). Because Plaintiffs were required to re-file this document, Exhibit 2 appears twice on the docket at **Dkt Nos. 1-4 and 4-3**. A proposed redacted version is submitted concurrently herewith. Plaintiffs do not oppose this request.

Although "[t]he common law right of public access to judicial documents is firmly rooted in our nation's history," this right is not absolute, and courts "must balance competing considerations against" the presumption of access. *Lugosch v. Pyramid Co. v. Onondaga*, 435 F.3d 110, 119-20 (2d Cir. 2006). Here, filing Exhibit 2 in redacted form is necessary to prevent the unauthorized dissemination of confidential business and highly sensitive personal information including commercial information about third parties and highly sensitive personal and financial information. See, e.g., *Ghouneim v. 352-354 H.D.F.C.*, 2019 WL 1523326, at \*5 (S.D.N.Y. 2019) (sealing ECF submissions "to protect sensitive personal and financial information"); *Abraham v. Leigh*, 2020 WL 5095655, at \*1 (S.D.N.Y. 2020) (maintaining documents "under seal because they disclosed 'irrelevant, salacious, or personally sensitive material'"). Mr. Koo's declaration in opposition to the TRO attests to the sensitive nature of this information. Dkt. No. 8-1 at ¶ 44. Accordingly, Defendants request that the Court seal the requested portions of Exhibit 2.

Respectfully submitted,

/s/ Brian Danitz  
BRIAN DANITZ

Encl.

cc: All counsel of record